

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

Derieon Thomas,)	
)	
Plaintiff,)	Case No. 22-cv-2026
)	
v.)	Honorable Steven C. Seeger
)	
Dart, <i>et al.</i> ,)	
)	
Defendants.)	

**DEFENDANT LT. JAIME PHILLIPS’ AGREED MOTION FOR AN EXTENSION OF
TIME TO ANSWER OR OTHERWISE PLEAD**

Defendant Lt. Jaime Phillips, by his attorneys Jason E. DeVore and Zachary G. Stillman, pursuant to Federal Rule of Civil Procedure 15(a)(3) and 6(b), respectfully moves this Court for an extension of time up to and including January 8, 2024, to answer or otherwise plead to Plaintiff’s Amended Complaint. In support of this Motion, Defendant states the following:

1. On December 8, 2023, the parties met via Zoom regarding this Motion, and Plaintiff agreed to the proposed extension.
2. Plaintiff filed his amended complaint on October 19, 2023. (Dkt. 49).
3. The present deadline for Defendant Lt. Jamie Phillips’ responsive pleading to Plaintiff’s Amended Complaint is December 28, 2023.
4. Defendant now requests an 11-day extension, until January 8, 2024, to file his Answer or other Responsive Pleadings to Plaintiff’s Amended Complaint.
5. Under Fed. R. Civ. P. 6(b), this Court “may, for good cause, extend” any deadline before the expiration of that time. Fed. R. Civ. P. 6(b)(1).

6. Not granting an extension of time for Defendant would be prejudicial because the December 28, 2023, due date does not allow sufficient time to properly prepare and submit Defendant's Responsive Pleading.
7. Defendant's requested extension of time does not prejudice Plaintiff in any way.
8. This motion is not being interposed for any improper purpose, undue delay, or harassment.
9. Additionally, given that December 28 falls during the holidays, Defendant requires additional time to answer or otherwise Respond to Plaintiff's Amended Complaint.
10. This is Defendant's first request for an extension of time to answer or otherwise plead.
11. Defendant respectfully requests that this Honorable Court grant this Motion for an Extension of Time to Answer or Otherwise Plead.

WHEREFORE, Defendant respectfully request that this Honorable Court enter an order as follows:

1. Granting Defendant Lt. Jamie Phillips' Agreed Motion for Extension of Time to Answer or Otherwise Plead; and
2. Granting Defendant until January 8, 2024, to file their Answer or Other Responsive Pleading; and
3. For any other relief this Court feels reasonable and just

Respectfully submitted,

/r/ Jason E. DeVore
Jason E. DeVore, One
of the Attorneys for Defendant

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CERTIFICATE OF SERVICE

Andrew H. Kim, law clerk, hereby certifies that, in accordance with Federal Rules of Civil Procedures 5 and Local Rules 5.5 and the General Order on Electronic Case Filing (ECF), the foregoing was served pursuant to the District Court's ECF system as to EFC filers on December 12, 2023.

/s/ Andrew H. Kim
Andrew H. Kim